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DEPARTMENT OF JUSTICE

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UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530
REGISTRATION UNIT
CRIMINAL DIVISION

SUPPLEMENTAL STATEMENT

*Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended*

JUL 29 1977

For Six Month Period Ending _____
(Insert date)

Name of Registrant

Registration No. 1421

DEVELOPMENT COUNSELLORS INTL. LTD.

Business Address of Registrant

733 Third Avenue - Suite 2100
New York, N. Y. 10017

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

not applicable

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

not applicable

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
not applicable				

-
5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☐ not applicable

If yes, identify each such person and describe his services.

not applicable

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
not applicable		

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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
not applicable			



II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

not applicable

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

St. Lucia National Development Corp.
P.O. Box 495
27 Brazil Street
St. Lucia, W. I.

8/77

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Acapulco Cultural & Convention Center
Netherlands Antilles Economic Mission
Newfoundland Dept. of Industrial Development
Trinidad and Tobago Industrial Development Corp.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Acapulco: followed up on direct mailings.

Netherlands Antilles: Publicized and informed U.S. businessmen about economic opportunities in the Netherlands Antilles.

Newfoundland: Publicized Newfoundland's investment climate in the United States via press releases, television appearances by provincial officials.

Trinidad and Tobago: Assisted and participated in industrial and trade shows; arranged for speeches and presentations by client to potential investors; worked with United States companies operating in Trinidad and Tobago to promote their operations to potential customers and suppliers in the U.S.

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

not applicable

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

not applicable

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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(see attached listing of receipts - monies from foreign principals)

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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not applicable

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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(see attached listing of disbursement - monies for foreign principals)

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
not applicable				

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
not applicable			

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Acapulco Cultural & Convention Center - - Mexico City, Mexico

Netherlands Antilles Economic Mission - - 30 Rockefeller Plaza, NY, NY 10020

Newfoundland Departemtn of Industrial Development - - St. John's, Newfoundland, Canada

Trinidad and Tobago Industrial Development Corp. - - Port of Spain, Trinidad, W. I.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?

Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

not applicable

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
articles

☐ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☒ Newspapers ☐ Libraries
☐ Legislators ☒ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups

☐ Other (Specify) _____

21. What language was used in this political propaganda:

☒ English

☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐

Exhibit B⁷ Yes ☐ No ☐

not applicable

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☐

not applicable

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

not applicable

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐ not applicable

If no, please attach the required amendment.

not applicable

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

not applicable

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

T. M. Levine

Ted M. Levine, President

Emanuel T. Ellenis
Emanuel T. Ellenis, Vice Pres.

Subscribed and sworn to before me at 733 Third Avenue - Suite 2100, New York, N. Y. 10017

this 31st day of August, 19 77

CYNTHIA ROSEL
Notary Public, State of New York
No. 41-8643070
Qualified in Queens County
Certificate filed in New York County
Commission Expires March 30, 1978

Cynthia Rosel

(Signature of notary or other officer)

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

Quevedo Cultural & Convention Center

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Receipts

REGISTRATION UNIT
CRIMINAL DIVISION

1977

1/30 - 7/29/77

Total

*Feb 7
July 13
13.*

2120 -

1100 -

600 -

3920 -

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1800 -

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DEVELOPMENT COUNSELLORS INT'L. LTD.
SUITE 2100, 733 THIRD AVENUE
NEW YORK, N. Y. 10017

Netherlands Antilles Economic Mission

1977	1/30 - 7/29/77	Total	Fee	Expense	Receipts
1	Feb 15	175866	1500 -	15866	
2	Mar 31	168267	1500 -	18267	
3	Apr 29	201041	1500 -	51041	
4	29	290589	1350 -	15589	
5	May 24	175448	1500 -	15448	
6	July 1	169041	1500 -	19041	
7	28	172866	1500 -	22866	
8		1353118	1035000	318118	
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DEVELOPMENT COUNSELLORS INT'L. LTD.
SUITE 2100, 733 THIRD AVENUE
NEW YORK, N. Y. 10017

Newfoundland Dept. of Industrial Development

1977	1/30 - 7/29/77	Total	Fee	Expense	Receipts
1 Feb 15		420534	358333	62201	
2 Apr 20		810674	716666	94008	
3 June 2		440071	358333	81738	
4		1671279	1433333	237947	
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DEVELOPMENT COUNSELLORS INT'L. LTD.
SUITE 2100, 733 THIRD AVENUE
NEW YORK, N. Y. 10017

Trinidad + Tobago Industrial Development Corp.

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1977	1/30 - 7/29/77	Total	Fee SEP	Expenses	Receipts
1 Mar 28		3300 -	3300	REGISTRATION UNIT	
2 31		2347533		ORIGINAL DIVISION	
3 Apr 5		628554	3300 -	2347533	
4 May 6		3300 -	3300 -	298554	
5 June 3		4105115	3300 -	3775115	
6 29		1107839	3300 -	777839	
7 July 27		39144		39144	
8		8888185	1650000	7238185	
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DEVELOPMENT COUNSELLORS INT'L. LTD.
SUITE 2100, 733 THIRD AVENUE
NEW YORK, N. Y. 10017

Acapulco Cultural & Convention Center

1977		1/30 - 7/29/77		Purpose	Disbursements Amount	Total
1	Feb	Destination Consultants	Telephones		5078	
2		Annie Barbier	Secretarial		150 -	
3		David Blair Co.	Printing		1075	
4		Meeting + Conv. / Ziff Davis	Space		176596	
5	May	Destination Consultants	Telephones		10588	
6		"	"		3330	
7	June	Media Distribution	Printing		1418	
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Netherlands Antilles Economic Mission

1977	1/30 - 7/29/77	Purpose	Disbursements	
			Amount	Total
1	Feb	Burrelle's Press Clip.	73 50	
2	Mar	Emanuel T. Ellen's	23 -	
3		Burrelle's Press Clip.	73 50	
4		York Directions	4 70	
5		Brown's Reproduction	35 63	
6		St. John Associates	150 -	
7	Apr	Burrelle's Press Clip.	84 -	
8		Emanuel T. Ellen's	65 25	
9		Western Union	47 5	
10		St. John's Associates	78 78 4	
11	May	Burrelle's	72 10	
12	June	World Trade Academy Press	6 48	
13		Western Union	48 60	
14		Burrelle's	77 10	
15		Vita Speeches	37 5	
16		Emanuel T. Ellen's	22 85	
17	July	Burrelle's	76 40	
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DEVELOPMENT COUNSELLORS INT'L. LTD.
SUITE 2100, 733 THIRD AVENUE
NEW YORK, N. Y. 10017

Newfoundland Dept. of Industrial Development

1977	1/30 - 7/29/77	Purpose	Disbursements	
			Amount	Total
1 Feb	National Tech. Info. Service	Publication	45-	
2	Burrelle's Press Clips	Press Clips	89 60	
3 Mar	Irene Cohen	Expense	10 10	
4	Emanuel T. Ellenis	"	15 -	
5	Public Relations Soc of Am	Dues	40 -	
6	Burrelle's	Press Clips	74 20	
7	Copeland Cutler	Fare	275 02	
8	Nations Business	Subscription	167 5	
9	Daily Commercial News	"	42 -	
10 Apr	Burrelle's	Clips	75 95	
11	Finley Stat Service	Stats	449 90	
12	E. T. Ellenis	Expense	48 40	
13	Emergy Air Freight	Freight	19 27	
14	York Directions	Stats	126 5	
15	Emanuel T. Ellenis	Expense	23 90	
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Trinidad & Tobago Industrial Development Corp.

1977	1/30 - 7/29/77	Purpose	Disbursements Amount	Total
Feb	McGraw-Hill Pubn.	Space	1729308	
	ITC/Caribbean Bus News	Subscription	1750	
	Journal/Bd. of Trade Met Toronto	Space	53718	
	Media Distribution	Printing	7946	
Mar	AIDS/IDAC Conference	Meeting	5-	
	Saddle River Studios	Art Work	40-	
	American Import/Export	Space Production	7-	
	Am Indust. Prop. Report	Space	14950	
	Am Banker	" Prod.	313	
	Caribbean Bus. News	Subscription	1750	
	V & S. Stats	Stats	562	
	Wash. Star News	Space	139944	
	Columbia Books	Directory	25-	
	Morningside Press	Printing	10260	
	Positives Plus	Photography	11907	
Apr	The Montreal Gazette	Space	9537	
	Wall St. Journal	"	245951	
	Century Letter	Printing	18119	
	Doyle Delta	Storage	1880	
	Forbes	Space	787185	
	Industry Week	"	179095	
	Positives Plus	Photography	6332	
	V & S Stats	Stats	1123	
	Frank Knight	Production Supplies	4287	
	Millie Brown	Expense	215	
	Financial Times	Space	216380	
	Journal of Commerce	"	183956	
May	Caribbean & Cent. Am. Letter	Subscription	38-	
	Ed Burnett Consultants	Mailing List	113-	
	Archer Courier	Messenger	1045	
	Emery Air Freight	Freight	6605	
	Journal of Commerce	Print - Reprints	455-	
	Positives Plus	Photography	14272	
	Wall St. Journal	Space	888384	
	Fortune	"	154105	
	Financial Post/McLean Hunter	"	127587	
	The N.Y. Times	"	942803	
June	Frank Knight	Art Expense	3240	
	Knight Associates	" Work	17095	
	Western Union	Telegrams	157075	
	Forward			6117999

RECEIVED Corp.

REGISTRATION UNIT
CRIMINAL DIVISION

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DEPARTMENT OF JUSTICE

SEP 2 4 23 PM '77

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

REGISTRATION UNIT
CRIMINAL DIVISION

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ yes _____ or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)



Signature

August 26, 1977

Date

Ted M. Levine

Please type or print name of
signatory on the line above

President

Title